

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

RAS Crane LLC

Attorneys for Secured Creditor
10700 Abbott's Bridge Rd., Suite 170
Duluth, GA 30097
Telephone No.: 973-575-0707 (local)
Telephone No.: 561-241-6901 (main)

In Re:

David G Delaplain,
Debtor,
Laura Lee Delaplain
fka Laura Lee Van Orman,
Joint Debtor.

Case No.: 19-12706-MBK

Chapter: 13

Hearing Date: February 26, 2020

Judge: Michael B. Kaplan

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY and CO-DEBTOR STAY

HEARING DATE AND TIME:
February 26, 2020 at 9:00 a.m.

**ORAL ARGUMENT IS REQUESTED IN THE EVENT
OPPOSITION IS TIMELY FILED**

TO:

<i>Debtor(s)-</i> David G Delaplain 210 English Place Basking Ridge, NJ 07920 <i>Joint Debtor</i> Laura Lee Delaplain fka Laura Lee Van Orman 210 English Place Basking Ridge, NJ 07920	<i>Debtors' Attorney-</i> John F. Bracaglia, Jr. SAVO, SCHALK, Gillespie, O'Grodnick & Fisher, P.A. 56 East Main Street Suite 301 Somerville, NJ 08876	<i>Trustee-</i> Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650	<i>U.S. Trustee-</i> US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102
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PLEASE TAKE NOTICE that on February 26, 2020 at 9:00 a.m., or as soon thereafter as counsel may be heard, RAS Crane LLC, attorneys for WILMINGTON SAVINGS FUND SOCIETY, FSB, AS TRUSTEE OF STANWICH MORTGAGE LOAN TRUST C, the within creditor ("Creditor"), shall move before the Honorable Judge Michael B. Kaplan, United States Bankruptcy Judge, at 402 East State Street Trenton, N.J. 08608 Courtroom #8, for an Order pursuant to 11 U.S.C. §362(d)(1) granting such Creditor relief from automatic stay and Co-Debtor Stay pursuant to 11 U.S.C. §1301 (c) or, for costs and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Certification in Support of Motion for Relief. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the **CLERK, UNITED STATES BANKRUPTCY COURT, Clarkson S. Fisher US Courthouse 402 East State Street Trenton, NJ 08608**, and simultaneously served on Secured Creditor's counsel, **RAS Crane LLC, 10700 Abbott's Bridge Rd., Suite 170 Duluth, GA 30097**, so as to be received no later than seven (7) days before the return date set forth herein.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

DATED: January 28, 2020

RAS Crane, LLC

Authorized Agent for Secured Creditor
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By: /s/ Aleisha C. Jennings _____

Aleisha C. Jennings, Esquire

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